UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	
UNITED STATES OF AMERICA)	
)	
V.)	No. 16-cr-10094-LTS
)	
ROSS MCLELLAN,)	
Defendant)	
)	
)	

DEFENDANT ROSS MCLELLAN'S SUPPLEMENTAL EXHIBIT LIST

Defendant, Ross McLellan, by and through undersigned counsel, hereby respectfully submits the following supplemental list of potential defense exhibits to the Court in advance of the June 4, 2018 trial. Numbers 520 through 523 have been added since the prior version. The defendant reserves his right to supplement this list and/or to introduce documents or audios during his cross-examination of Government witnesses.

Respectfully Submitted, Ross McLellan By His Attorneys,

/s/ Martin G. Weinberg

Martin G. Weinberg Mass. Bar No. 519480 20 Park Plaza, Suite 1000 Boston, MA 02116 (617) 227-3700 owlmgw@att.net

/s/ Robert M. Goldstein

Robert M. Goldstein 20 Park Plaza, Suite 1000 Boston, MA 02116 (617) 742-9015 rmg@goldstein-lawfirm.com

Dated: June 1, 2018

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this date, June 1, 2018, a copy of the foregoing document has been served, via ECF, upon Assistant U.S. Attorney Stephen E. Frank and U.S. Department of Justice Trial Attorney William Johnston.

/s/ Martin G. Weinberg
Martin G. Weinberg

CASE NAME: UNITED STATES OF AMERICA V. ROSS MCLELLAN AS OF: June 1, 2018 CRIMINAL CASE NO. 16-10094-LTS DEFENSE'S EXHIBIT LIST Exhibit Exhibit BegDoc EndDoc Doc Type To From Marked Date Date Admitted Offered No. [Yes/No] [Yes/No] Admitted Defense 300 SS2 000000071 SS2 000000071 Email & 5/1/11 Simone Paul, Jonathan Sarah Lewis SS2 000000072 SS2 000000089 Attachment Norris SS2_000000090 SS2_000000104 Defense 301 RM-000001 RM-000004 File N/A Defense 302 RM-000005 RM-000008 File N/A Defense 303 SS2 00000066 SS2 00000068 9/30/11 Carol L'Heveder, Jonathan Email Sarah Lewis Norris SS2_00000034 SS2_00000040 4/11/11 Defense 304 File Defense 305 SS1 00088738 SS1 00088743 Email 6/22/12 Dominic Graham, Paul Michael Gregson Fraser, Abigail Greenway Defense 306 SS1_01342767 SS1_01342767 Email 8/26/11 Robin Oliver, Marshall Mark Leaden Bailey, Jonathan Norris Defense 307 SS1 00810416 SS1 00810416 Email 8/26/11 Mark Hansen Ross McLellan 308 SS1_00584563 SS1_00584563 Ross McLellan Defense Email 3/16/11 Chris Carlin 309 SS1 01215715 SS1 01215716 Ross McLellan Defense Email 9/5/11 Brvan Woodard Defense 310 SS1 01215709 SS1 01215711 9/5/11 Ross McLellan Bryan Woodard Email SS2 00000225 Defense 311 SS2 00000226 Email 11/3/10 David Puth Ross McLellan Defense 312 SS2 00000002 SS2 00000003 Email 11/2/10 Mark Hansen Anthony Scully Defense 313 SS2 00000127 SS2 00000127 11/3/10 Simone Paul Sarah Lewis Email Defense 314 SS2 00000227 SS2 00000227 Email 11/3/10 Mark Hansen Ross McLellan SS2 00000229 SS2 00000230 Ross McLellan Mark Hansen Defense 315 Email 11/3/10 SS2_00000260 Defense 316 SS2_00000262 11/3/10 Bryan Woodard Melissa Mckay Email Defense 317 SS1_00636326 SS1 00636330 Email 11/3/10 Ross McLellan, Vincent Mark Hansen Manzi et al. SS1 00448645 Defense 318 SS1 00448645 Email 1/5/10 Nick Bonn Ross McLellan 319 SS1 00300269 SS1 00300270 Ross McLellan, David Puth Defense Email 10/20/10 Karen Keenan Defense 320 SS1_00957546 SS1_00957546 Email 10/21/10 Ross McLellan Karen Keenan Defense 321 SS1 00958789 SS1 00958790 11/2/10 Ross McLellan Karen Keenan Email 322 SS1_00230295 SS1_00230295 3/23/11 Ross McLellan Defense Email **Edward Pennings** 323 3/22/11 Defense SS1_01136600 SS1_01136600 Ross McLellan Karen Keenan Email Defense 324 SS1 00628575 SS1 00628576 Email 12/22/10 Karen Keenan, David Puth Ross McLellan 325 SS1 00627649 SS1 00627650 12/22/10 Karen Keenan, David Puth Ross McLellan Defense Email et al. Defense 326 SS1 00873565 SS1 00873565 1/28/11 Karen Keenan Ross McLellan Email Defense 327 SS1_00758288 SS1_00758288 Email 4/13/11 Karen Keenan Ross McLellan 328 Defense SS1_01217587 SS1_01217587 Email 9/27/11 Nick Bonn Ross McLellan

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12/24/10

5/12/10

11/2/10

11/2/10

Ross McLellan, Vincent

Manzi, Chris Carlin et al. Ross McLellan

Melissa Mckay, Krystyna

Melissa Mckay

Melissa Mckay

Simone Paul

Audio

Email

Email

Email

Defense

Defense

Defense

Defense

329

330

331

332

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SS1 00599299

SS2 00000213

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						Carlin, Catherine Norcott, Tom Bryant	
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Defense	352	SS1_00811246	SS1_00811246	Email	8/26/11	Mark Hansen	Ross McLellan
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				Attachment			
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Defense	373	RE Austen Summary	RE Austen Summary	Email	3/11/11	Andrew Williams, Helen Baldock	Ben Gunnee

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Defense	374	RE Project Austen	RE Austen Summary	Email	4/21/11	Rick Boomgaardt, Edward Pennings et al.	Anita Butler	
Defense	375	RE Post Transition Comments	RE Post Transition Comments	Email	6/13/11	Brian Griffin, Anita Butler et al.	Ciaran Naughton	
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Defense	485	SS1_01346473	SS1_01346474	Email & Attachment	2/3/11	Rick Boomgaardt	Chris Carlin
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Defense	500	SS3_000046421	SS3_000046421	Email	10/3/11	Trading Solutions et al.	Allyson O'Connor
Defense	501	SS1_01123848	SS1_01123848	Email	8/30/11	Jack Ho, Niall O'Sullivan	Marc Littlewood
Defense	502	SS1_00732870	SS1_00732870	Email	6/2/11	Paul Gallagher, Michael Mahoney et al.	Christopher Martin
Defense	503	SS1_01198238	SS1_01198241	Email	5/4/11	Rick Boomgaardt, Cassie Waller et al.	Raymond Pestana
Defense	504	SS1_00460089	SS1_00460089	Email	5/30/11	Edward Pennings, Rick Boomgaardt	Faheem Malik
Defense	505	SS1_01157292	SS1_01157293	Email and Attachment	6/16/11	Edward Pennings, Rick Boomgaardt et al.	Killian Buckley
Defense	506	SS1_01165632	SS1_01165632	Email and Attachment	6/22/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	507	SS1_00077222	SS1_00077222	Email	10/30/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	508	SS1_00075059	SS1_00075060	Email	3/3/11	Edward Pennings, Rodney Ringrow	Anadoth Poyil Krishnadasan 1
Defense	509	SS1_00553373	SS1_00553373	Email	2/15/11	Edward Pennings, Lachlan French et al.	Anadoth Poyil Krishnadasan
Defense	510	SS1_00073667	SS1_00073667	Email	12/20/10	Edward Pennings, Michael Gardner et al.	Anadoth Poyil Krishnadasan
Defense	511	SS3_000055445	SS3_000055445	Email	4/7/11	Thomas McNichol	Kevin Walker
Defense	512	SS3_000050625	SS3_000050625	Email	3/8/2011	Kristen Morris, Allen Kwong	Michael Brunell
Defense	513	SS3_000046340	SS3_000046342	Email	3/1/11	Michael Brunnell, Christoher Baker et al.	Renee Isberg
Defense	514	SS3_000046325	SS3_000046325	Email	3/1/11	Michael Brunnell, Christoher Baker et al.	Renee Isberg
Defense	515	SS3_000046240	SS3_000046241	Email and Attachment	8/2/11	Chris Carlin, Kevin Miller	Jason Lawrence
Defense	516	SS3_000046180	SS3_000046180	Email	3/10/11	William Andrade	Kristen Morris
Defense	517	SS3_000054370	SS3_000054390	File	N/A		
Defense	518	SS1_01357792	SS1_01357792	Email	3/2/11	Chris Carlin, Kevin Walker et al.	Thomas McNichol
Defense	519	SS1_01357793	SS1_01357795	Email	3/4/11	Kristen Morris	Chris Carlin
Defense	520	SS1_00167724	SS1_00167725	Email	3/2/10	Rodney Ringrow	Edward Pennings
Defense	521	SS2_0000164 SS2_0000167 SS2_0000200	SS2_00000165 SS2_00000198 SS2_00000202	Email and Attachment	11/2/10	Ross McLellan	Edward Pennings
Defense	522	SS1_00296829	SS1_00296829	Email	11/29/10	Ian Holden, Edward Pennings	Ross McLellan
Defense	523	SS1_00012164	SS1_00012165	File	5/12/11	_	